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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	Chapter 11
<i>In re:</i>	:	Case No. 05-44481 (RDD)
DELPHI CORPORATION, <i>et.al.</i> ,	:	(Jointly Administered)
Debtors	:	
	:	Hearing Date: July 31, 2008
	:	10:00 a.m.
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**RESPONSE OF CREDITOR MARY H. SCHAFER TO THIRTIETH OMNIBUS
CLAIM OBJECTION**

Mary H. Schafer ("Claimant"), by her attorneys, Teitelbaum & Baskin, LLP, for her response to the Debtors' thirtieth omnibus objection to claims, respectfully submits:

- 1) On July 28, 2006, Claimant caused a proof of claim to be timely filed in these cases (the "Claim"). The Claim was assigned claim number 12446.
- 2) The Claim arises from Claimant's employment with the Debtors from 1977 to 2007.
- 3) Claimant held the title of Business Line Executive and was responsible for running the Debtors' safety electronics business.
- 4) The Claim is predicated upon compensation and benefits which were vested in Claimant prior to and after the commencement of these cases but which were not paid.

5) Included in the Claim (subject to the continuing right of Claimant to amend the Claim) are vested interests in:

- i) 16,128 Restricted Stock Units awarded during the years 2003, 2004 and 2005, the value of which is to be determined;
- ii) \$42,000 for compensation awarded but not paid in connection with a recognition grant for years 2005 and 2006;
- iii) stock options which were awarded under long term incentive plans;
- iv) benefits, in an amount to be determined, under the Benefit Equalization Plan;
- v) benefits, in an amount to be determined, under the Supplemental Executive Retirement Plan but which is estimated to be not less than \$730,000;
- vi) claim to enforce indemnification rights as a former employee;
- vii) benefits, in an amount to be determined, under the supplemental group life insurance plan;
- viii) litigation claims arising from Debtors' implementation of a 401K plan which required Claimant to purchase Debtor's stock;
- ix) vested awards under the annual and long term incentive plans for the years 2002 through 2006; and
- x) vested awards under the Performance Achievement Plans for the years 2004-2006 and 2005-2007, in an amount which is calculated to be not less than \$255,850.

6) Pursuant to the Notice of Objection to Claim, dated June 27, 2008, the Debtors seek to disallow the Claim based upon a "books and records" objection.

- 7) Claimant disagrees with the objection and hereby requests that the objection to the Claim be treated pursuant to The Claims Objection Procedures Order, entered on December 7, 2006.
- 8) Claimant further contends that documents supporting the Claim are in the possession of the Debtors and that discovery in this matter is appropriate.
- 9) Documents in possession of Claimant in support of the Claim were annexed to the Proof of claim filed in these cases.
- 10) Claimant further reserves all rights to further amend or supplement the Claim to conform to the proof adduced in connection with a trial in this matter.

WHEREFORE, Claimant respectfully requests that the Claim not be expunged as requested in the Objection, but that the Claim be treated as a separate disputed claim pursuant to the Claims Objection Procedures Order, and that the Court grant such other and further relief as may be appropriate.

July 24, 2008

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